

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

---

SAMUEL POND,

Case No. 20-cv-587 (PAM/JFD)

Plaintiff,

**PROTECTIVE ORDER**

v.

UNION PACIFIC RAILROAD  
COMPANY *a Delaware Corporation*,

Defendant.

---

The parties to this Protective Order have agreed, through counsel, to the terms of this Protective Order; accordingly, **IT IS HEREBY ORDERED:**

1. The Train Image Recordings (TIRs), including Front Image Camera (FIC) and Cab Image Camera (CIC) videos produced by Defendant Union Pacific Railroad Company to Recipient Plaintiff in this litigation shall not be copied, uploaded, or disseminated to any public electronic media or any social media outlet, for any purpose, including for use in any marketing or advertising on behalf of Plaintiff's counsel.
2. The Recipient shall ensure that if any portion of the FIC and/or CIC video is shared with any consultant, witness, expert witness, or employee, these individuals shall be advised of this Protective Order and shall be bound by the same, and further that they shall not allow any portion of the FIC and CIC video to be copied, downloaded or disseminated to any public electronic media or any

social media outlet, for any purpose, including for use in marketing or advertising initiatives.

3. This Protective Order shall survive the termination of this litigation.

Date: October 22, 2021

s/ John F. Docherty  
JOHN F. DOCHERTY  
United States Magistrate Judge